

IPR2016-01842, IPR2016-01860
IPR2016-01863, IPR2016-01864

Apple, Inc.,
Petitioner

v.

Papst Licensing GmbH & Co. KG,
Patent Owner

U.S. Patent No. 9,189,437

U.S. Patent No. 8,966,144

U.S. Patent No. 8,504,746

U.S. Patent No. 6,470,399

‘399 PATENT, ‘144 PATENT, ‘746 PATENT AND ‘437 PATENT INTRODUCTION

The ‘746 Patent recognizes that the existing options were wasteful and inefficient and presents a solution that would achieve high data transfer rates, without specialized software, while being sufficiently flexible to operate independent of device or host manufacturers. *Id.* at 2:22-41 and 3:28-31. **The resulting invention would allow a data acquisition system to identify itself as a type of common device so as to leverage the inherent capabilities of general-purpose, commercially-available computers. *Id.* at 4:13-27. Accordingly, users could avoid loading specific software; improve data transfer efficiency; save time, processing power, and memory space; and avoid the waste associated with purchasing specialized computers or loading specific software for each device. *Id.* at 3:28-31, 3:32-45, 7:32-65, 8:29-36, 9:16-19 and 11:29-46. The ‘746 Patent claims variations of this concept and provides a crucial, yet seemingly simple, method and apparatus for a high data rate, device-independent information transfer. *Id.* at 3:28-31.**

‘399 PATENT, ‘144 PATENT, ‘746 PATENT AND ‘437 PATENT INTRODUCTION

In contrast, the interface device of the ‘746 Patent avoids this problem because it simulates, *both in terms of hardware and software*, the way a hard drive works. Consequently, it can respond to a SCSI inquiry that it is a hard drive without risking destructive interactions with the host device or reconfigurations of the interface device by the host device. Exhibit 1001 (‘746 Patent) at 4:14-18 (“The interface device according to the present invention therefore simulates, both in terms of hardware and software, the way in which a conventional input/output device functions, preferably that of a hard disk drive.”).

Paper 16 (Patent Owner Response IPR2016-01863) at 23;
Exhibit 1001 (‘746 Patent IPR2016-01863) at 4:14-18

PRIOR ART INTRODUCTION - PUCCI

The ION system couples an analog to digital converter (“ADC”) to a SCSI target interface through a memory buffer. The SCSI target responds to disk drive commands for reading. However, access by the host to ADC data is done by means of the host reading a single block address in the simulated disk drive. Thus, the ADC data is not provided by files in a file system. The ION reference also has the ability to emulate a file system, but it teaches that this is only used for disk drive performance analysis, not for ADC access. *Id.* at 236. As such, the reference teaches away from accessing ADC data in the form of files because files exist but are not used for ADC data. **ADC data is accessed by an application that does not use the host computer’s file system, and instead reads a certain disk block to obtain ADC data.** *Id.* at 221.

Paper 16 (Patent Owner Response IPR2016-01863) at 12-13;
Exhibit 1041 (Pucci IPR2016-01863) at 221

PRIOR ART INTRODUCTION - PUCCI

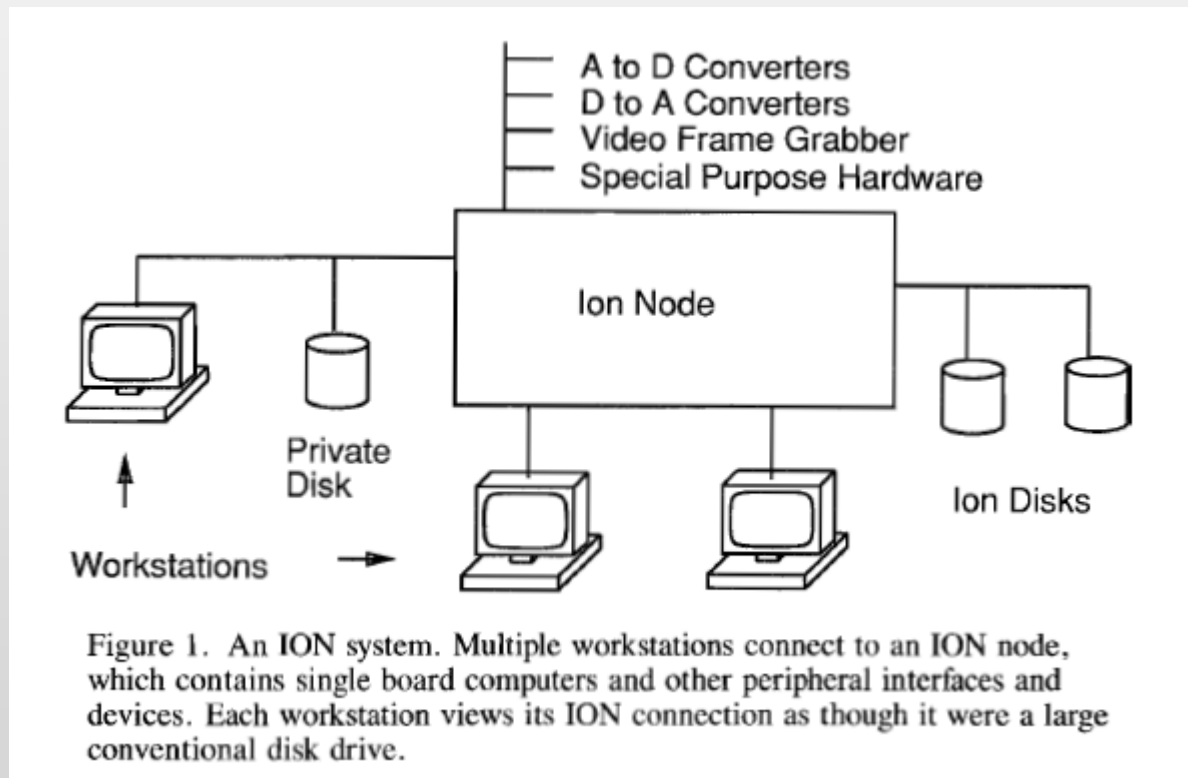


Exhibit 1041 (Pucci IPR2016-01863) at Figure 1; Paper 2 (Petition IPR2016-01863) at 18

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